

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE**

DOROTHY HANDLEY-MILEY,

Plaintiff,

v.

DOCKET NO.
JURY DEMANDED

GREYHOUND LINES, INC., and
FIRSTGROUP SERVICES, INC.

Defendants.

NOTICE OF REMOVAL

COME NOW Defendants Greyhound Lines, Inc. (“Greyhound”) and FirstGroup Services, Inc. (“FirstGroup”), by and through its counsel, and files this Notice of Removal based upon the following:

1. On September 9, 2022, Plaintiff commenced a civil action in the Circuit Court for Davidson County styled *Dorothy Handley-Miley v. Greyhound Lines, Inc. and FirstGroup Services, Inc.*. A copy of Plaintiff’s Complaint is attached hereto as **Exhibit A**.
2. On September 13, 2022, Plaintiff effected service of process on Greyhound and FirstGroup by serving their registered agent for service of process with a copy of the Summons and Complaint.
3. Therefore, it has been less than thirty (30) days since Greyhound and FirstGroup were served with the Summons and Complaint.

4. As alleged in the Complaint,¹ Plaintiff Dorothy Handley-Miley is an adult resident citizen of the state of Tennessee. Exh. A at ¶ 1.1

5. As alleged in the Complaint, Defendant Greyhound is a foreign corporation organized under the laws of Delaware with its principal place of business in Dallas, Texas. Exh. A at ¶ 1.2. Accordingly, Greyhound is a citizen of the state of Delaware and the state of Texas for purposes of diversity of citizenship jurisdiction. 28 U.S.C. § 1332(c)(1).

6. As alleged in the Complaint, Defendant FirstGroup is a foreign corporation organized under the laws of Delaware with its principal place of business in Wilmington, Delaware. Accordingly, FirstGroup is a citizen of the state of Delaware for purposes of diversity of citizenship jurisdiction. 28 U.S.C. § 1332(c)(1).

6. Therefore, based on the foregoing, there is complete diversity of citizenship as between Plaintiff and Defendants.

7. As alleged in the Complaint, the amount in controversy exceeds the sum of \$75,000 exclusive of interest and costs. Specifically, Plaintiff prays for an award of \$750,000 for alleged damages. Exh. A at Prayer for Relief.

8. Accordingly, the Complaint is removable pursuant to 28 U.S.C. § 1441.

9. Venue is proper in this Court pursuant to 28 U.S.C. § 123(b)(1) because it is the “district and division embracing the place where such action is pending.” 28 U.S.C. § 1441(a).

¹ Defendants restate the referenced allegations in the Complaint without prejudice to their right to Answer, assert defenses, or otherwise respond to the Complaint or any of the allegations or claims for relief set forth in the Complaint.

10. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon counsel for Plaintiff in the manner set forth in the Certificate of Service, and a copy is being filed with the Clerk of the Circuit Court for Davidson County, Tennessee.

WHEREFORE, Defendants Greyhound Lines, Inc. and FirstGroup Services, Inc. respectfully remove this action, now pending in the Circuit Court for Davidson County, Tennessee to the United States District Court for the Middle District of Tennessee at Nashville pursuant to 28 U.S.C. § 1446.

Respectfully submitted,

/s/ Andrew Gardella

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*Attorneys for Defendant Greyhound Lines,
Inc. and FirstGroup Services, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the foregoing counsel on this the 13th day of October, 2022 via electronic mail and via First Class U.S. Mail, postage prepaid:

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/s/ Andrew Gardella